

ISSUE DATE: June 20, 1996

DOCKET NO. E-002/M-95-54

ORDER DIRECTING COMPLETION OF SIMULTANEOUS NEGOTIATIONS BY JULY  
15, 1996

BEFORE THE MINNESOTA PUBLIC UTILITIES COMMISSION

Joel Jacobs  
Tom Burton  
Marshall Johnson  
Dee Knaak  
Don Storm

Chair  
Commissioner  
Commissioner  
Commissioner  
Commissioner

In the Matter of the Petition of Northern States  
Power Company for Approval of a Request for  
Proposal for Approximately 50 MW of  
Biomass Generation

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ORDER DIRECTING COMPLETION OF  
SIMULTANEOUS NEGOTIATIONS BY  
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**PROCEDURAL HISTORY**

On August 18, 1994, the Commission issued its ORDER ACCEPTING COMPANY'S PROPOSAL WITH MODIFICATIONS AND REQUIRING FURTHER FILINGS in Dockets E-002/RP-93-630 and E-002/CI-93-6. This Order approved most aspects of a competitive bidding process for Northern States Power Company and established the role of an independent evaluator in this process.

On January 18, 1995, Northern States Power Company (NSP) filed its petition for approval of a Request for Proposals (RFP) for the 50 MW of biomass.<sup>1</sup>

On April 25, 1995, the Commission approved NSP's biomass RFP.

On September 29, 1995, the Commission received the interim report of the independent evaluator and NSP's short list of bidders. The short list consisted of three developers: Norstar Power, LLC<sup>2</sup>, Minnesota Valley Alfalfa Producers (MnVAP), and Energy Performance Systems, Inc. which had the financial backing of Kenetech. When Kenetech withdrew its proposal prior to the final evaluation, Energy Performance Systems, Inc. was unable to continue in the evaluation process without Kenetech's support.

On November 29, 1995, Norstar Power filed a motion requesting that the Commission

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<sup>1</sup> Minn. Stat. § 216B.2424 (1994) requires NSP to construct and operate, or purchase, 50 MW of installed capacity generated by farm-grown, closed loop biomass by December 31, 1998.

<sup>2</sup> Norstar Power, LCC is a partnership between NRG Energy (a subsidiary of NSP) and Lindroc Energy.

1) clarify the definition of “closed loop, farm grown biomass,” and 2) permit short-listed bidders to update their best and final offer to reflect an expanded fuel definition.

On January 19, 1996, the Commission received the final report of the independent evaluator. The results of the final evaluation have not been disclosed to bidders.

On January 23, 1996, NSP notified the Commission that it was considering rejection of all bids, due to a number of considerations, including the pending Norstar motion, the possibility of change to the legislative mandate, and other factors. NSP stated that it would file its report and decision with the Commission within 30 days.

On February 12, 1996, the Commission issued an Order denying Norstar’s motion without prejudice. The Commission noted that refraining from clarifying the fuel definition at this point would give all parties the opportunity to consider the fate of the currently pending legislation.

On April 11, 1996, Governor Arne Carlson signed into law Minnesota Laws 1996, Chapter 450 (HF 2419) which made certain clarifications to the biomass mandate contained in Minn. Stat. § 216B.2424 (1994). The amendments to the biomass mandate specify the following:

- the biomass fuel must be intentionally grown for use in electric generation
- the power plant must be located within 400 miles of the site of biomass production
- at least 75 percent of the fuel for the plant must consist of qualifying biomass
- if the primary biomass fuel will be short rotation woody crops, non-qualifying biomass fuels may be used for an interim period not to exceed six years
- retrofitted generation facilities may be used

On February 23, 1996, Norstar Power notified NSP that it was withdrawing its French Island Proposal from consideration.

On March 7, 1996, NSP filed its report and decision to reject all bids.

On March 28, 1996, Norstar filed a motion requesting an investigation and an Order requiring compliance by NSP with the biomass RFP, or, alternatively, an Order requiring reimbursement of the expenses of the rejected short-listed bidders.

On or about April 1, 1996, the Minnesota Department of Public Service (the Department), the Residential Utilities Division of the Office of the Attorney General (RUD-OAG), MnVAP, Lindroc Energy and the City of St. Peter filed comments with respect to NSP's March 7 report.

On April 15, 1996, NSP filed its proposal on how to proceed in this matter.

On April 25, 1996, pursuant to Commission Notice, the following parties filed comments on NSP's proposal: the Department, RUD-OAG, Norstar, and MnVAP.

On April 25, 1996, NSP filed comments in opposition to Norstar's March 28, 1996 motion.

On May 16, 1996, the Commission met to consider this matter.

### **FINDINGS AND CONCLUSIONS**

In this Order, the Commission decides that NSP may reject all bids received to date. At the same time, however, the Commission will direct the Company to immediately proceed with simultaneous negotiations with the three companies whose participation in the bidding process is the most advanced: Norstar, MNVAP, and (if it can obtain a developer or serve as its own developer) EPS.

For purposes of analysis, the two questions are addressed separately as follows:

#### **I. REJECTION OF ALL BIDS TO DATE**

##### **A. NSP's Position**

NSP stated that it was rejecting each of the remaining biomass bids for reasons relating to price and risk concerns. The Company stated it does not believe that the bid process resulted in a competitive price for biomass fuel. NSP provided a comparison of the prices of the remaining bids as compared to a new, baseload, natural gas-fired combined cycle plant.

NSP further stated that its concerns were compounded by the significant contract exceptions proposed by the remaining bidders, which the Company argued allocated an unacceptable level of risk to NSP. In a proprietary portion of its filing, the Company discussed the principal risk posing problems associated with each bid.

NSP stressed that its dissatisfaction with the results of this bid does not represent a retreat from its intention to acquire new long-term resources through bidding, nor does the Company believe that the bid process was flawed. Rather, it believes that the outcome reflects the fact that a competitive market for biomass generation does not yet exist. For this reason, NSP expressed concern that re-bidding this increment may not yield any more desirable results.

##### **B. Parties' Comments on NSP's Decision to Reject All Bids**

###### **1. The Department**

The Department agreed with NSP that the proposals resulted in an energy price that is too high. It argued that acceptance of one of the remaining biomass proposals would be premature, since additional discussion with the RUD-OAG, the Department and Commission Staff may enable NSP to obtain biomass resources at a more reasonable cost. The Department recommended that the Commission accept, without investigation, NSP's proposal to reject all biomass proposals.

## **2. Lindroc Energy**

Lindroc, an owner in Norstar Power, LLC, expressed concern that NSP is delaying this process in an attempt to avoid the statutory mandate or narrow the possible facilities available to meet it. It argued that the Commission should not permit NSP to disregard the rules and deny to the bidders the benefits of the competitive bid process. Lindroc urged the Commission to reject NSP's position and to award the project in accordance with the rules of the bidding process and the recommendation of the independent evaluator.

With respect to price, Lindroc contended that both of the Norstar proposals were substantially below the range NSP's expected range as reflected in its 1993 Resource Plan (Docket E-002/RP-93-630), which suggested the lowest expected cost for biomass generation at 7.5¢/kWh. Lindroc further argued that NSP's delay in awarding this bid will only serve to increase the price of the resource, because delay could cause developers to lose advantage of the Federal Closed Loop Biomass Tax Credit, which provides for up to 2¢/kWh if the plant can be placed on line by July 1, 1999.

With respect to contract exceptions, Lindroc claimed that NSP has not notified Norstar or Lindroc that there continue to be problems with contract exceptions.

## **3. Minnesota Valley Alfalfa Producers**

MnVAP objected to NSP's petition to reject all bids. MnVAP argued that NSP has no legal basis upon which to reject all bids. MnVAP noted that the biomass RFP states only two reasons for rejecting all bids:

- 1) if the independent evaluator submits a recommendation to reject all bids, or
- 2) if, in NSP's judgement, the circumstances change significantly with regard to NSP's need for this resource. MnVAP argued that NSP cannot establish either of these criteria.

Regarding the first basis for rejection (evaluator's recommendation), MnVAP noted 1) that NSP's January 22, 1996 letter to the Commission stated that the evaluator's report "identifies the highest scoring proposal" and 2) that the Company's March 7, 1996 Biomass Phase I Report states that NSP has decided not to accept the recommendation of the evaluator. From

this, MnVAP concluded that the evaluator clearly did not submit a recommendation to reject all bids.

Further, MnVAP argued that NSP cannot establish a significant change to its need for the resource because, even with the legislative changes, the Company is still obligated to purchase 125 MW of farm grown, closed loop biomass pursuant to Minn. Stat. § 216B.2424.

Next, MnVAP asserted that NSP's rejection for reasons of price is inconsistent with statements contained in NSP's 1995 Resource Plan which indicate that the Company expects biomass costs to be in the range of \$0.05/kWh to \$0.12/kWh. NSP further stated that the results of competitive bidding would provide the Company with a better indication of biomass costs. MnVAP argued that at least its bid fell within the range of expected prices stated in NSP's integrated resource plan (IRP).

MnVAP also asserted that NSP's statement that bidders' proposed contract exceptions pose unacceptable risk is premature, since a contract cannot be negotiated until a winning bidder is selected. If, after contract negotiation with the winner NSP determines that a satisfactory contract cannot be achieved because the contractor demands unreasonable exceptions, the Company can present its argument on that point to the Commission. In addition, MnVAP noted that the independent evaluator did not reject any of the bids due to contract exceptions, as is provided for in the biomass RFP.

Finally, MnVAP stated its belief that it has either met all of NSP's concerns regarding contract exceptions, or proposed to resolve those concerns through negotiation. MnVAP concluded that in accordance with the RFP, the Commission should order NSP to select the winning bidder and to begin contract negotiations with the winner forthwith.

#### **4. City of St. Peter**

The City of St. Peter asserted that NSP's reasons for rejecting the bids (price and risk) were without merit. The City noted that the conditions listed in the RFP under which NSP may reject bids did not include price. Regarding risk resulting from contract exceptions proposed by the bidders, the City argued that it would also be premature to reject the bids on the basis of those proposed exceptions prior to contract negotiations taking place. In addition, St. Peter anticipated that NSP would argue that the recent amendments to the Biomass Mandate justify its rejection of the bids. St. Peter argued that allowing NSP to reject the bids on the basis of legislative amendment that the Company had supported at the legislature would also compromise the integrity of the process.

#### **5. The RUD-OAG**

The RUD-OAG argued that neither the high prices nor the contract exceptions are sufficient grounds for the Commission to approve NSP's rejection of the bids. The RUD-OAG noted that the approved RFP sets out the conditions under which bids may be rejected: if the independent evaluator so recommends, or, in NSP's judgement, if circumstances change

significantly with regard to NSP's need for the resource. The RUD-OAG argued that to reject all bids on grounds other than those announced in the RFP would compromise the integrity of the bidding process.

The RUD-OAG suggested, however, that the changes to the biomass mandate, which have now been finalized, may constitute a change in the circumstances regarding NSP's need for this resource and, hence, authorize rejection of the bids consistent with the terms of the RFP. Changes resulting from HF-2419 include:

- a much more specific definition of “farm-grown, closed loop biomass” than is contained in current law; this definition could render at least one of the projects ineligible to meet the mandate.
- non-biomass fuels may now be used for up to 25 percent of the fuel requirements,
- interim biomass fuels may now be used in certain instances, and
- plants of greater capacity than called for in the statute must now be considered “on an equal basis” with other proposals.

The RUD-OAG noted that all of these changes are likely to affect the cost and eligibility of current proposals and could induce greater participation and more competition in a re-bid or other process to satisfy the mandate. The RUD-OAG concluded that the changes to the biomass mandate constitute a significant change in the circumstances regarding the need for the biomass resource, and forms a valid and permissible reason for NSP to request Commission approval to reject all bids.

### **C. Commission Action Regarding NSP's Proposal to Reject All Bids**

The OAG, Norstar and MnVAP argued persuasively that it would be improper to permit NSP to reject the bids on the basis of price or contract risk. To do so, they argued, would establish criteria which were either not included in the original RFP (price) or were already relaxed by the Company (risk). However, the RFP did include language that the Company could reject all bids if “circumstances change significantly with regard to NSP's need for this resource.” The RFP stated:

NSP also reserves the right to cancel this RFP or to reject all bids in the event that the independent evaluator submits a recommendation to reject the bids that were received or, in NSP's judgement, ***if circumstances change significantly with regard to NSP's need for this resource.*** RFP cancellation would be subject to the approval of the MPUC. (Emphasis added.)

The Commission finds that the legislative amendments to the biomass RFP constitute a significant change to NSP's need for this resource. For example, amendments to the biomass

mandate place various requirements on the fuel supply (e.g. requiring that it must be located within 400 miles of the site of generation) and in other cases permit some flexibility which was not reflected in the original RFP (e.g. allowing a facility to use non-biomass fuels to satisfy up to 25 percent of the facility's fuel requirements, and developers using short rotation woody crops as a permanent fuel may use certain interim fuels).

Further, the Commission clarifies that it is its understanding (as addressed in the next section) that NSP's proposal to reject the current bids will not terminate the participation of the affected bidders, but is intended to set the stage for continued negotiation and consideration of the parties' bids outside the confines of the highly-structured Commission-approved bid process, as described further below

In these circumstances and with this specific understanding, the Commission will approve NSP's rejection of the current bids, on the basis of changed circumstances, as stated in the RFP.

## **II. NSP'S PLAN TO ACQUIRE 50 MW OF THE BIOMASS MANDATE**

### **A. NSP's Proposal**

On April 15, 1996, NSP proposed a compliance plan to acquire the first 50 MW of the biomass mandate, given its proposal to reject all bids. In order to comply with the mandate in a cost-effective and timely manner, it seeks to meet the following objectives:

- Preserve the integrity of the competitive bidding process
- Minimize cost and risk for ratepayers
- Be fair to bidders that have participated in the Biomass Phase I bidding process to date
- Maximize bidder opportunities to take advantage of federal tax credits and grants
- Minimize the time required to select winning bidders in order to meet the biomass mandate schedule requirements and maximize the time available to establish fuel crops

NSP described three procedural alternatives for meeting its objectives and complying with the mandate: Re-bid on a "normal" schedule, re-bid on an "expedited" schedule, and a "revised offer process" with current short-listed bidders. With respect to the last mentioned alternative, NSP suggested the following procedure for this process:

1. NSP and the independent evaluator would meet with bidders on an individual basis to identify RFP elements which may contribute to higher prices. NSP would inform bidders that the Company's objective is to reduce the cost of biomass to \$0.06/kWh. The Company would also discuss the implications of the changes to the mandate, concerns with contract terms, and potential project changes which could lead to greater efficiency and lower cost.
2. NSP would meet with Commission staff and interested parties to summarize discussions with the bidders and discuss requirements to be placed in a Revised Offer



Request. NSP would then take the following steps to select a winning proposal:

- a. issue a Biomass Phase I RFP Addendum to short-listed bidders (by June 1, 1996);
- b. issue a Revised Offer Request which would reflect revision requirements as discussed by Commission staff, DPS, OAG and IWLA (June 15, 1996);
- c. submit revised offers to independent evaluator (July 15, 1996);
- d. evaluator scores revised offers using original scoring criteria and makes a recommendation to NSP (August 15, 1996);
- e. NSP discusses recommendations with Commission Staff, the Department, the RUD-OAG and IWLA as needed;
- f. NSP selects the winning bidder(s) by September 1, 1996, followed by contract negotiations

Under its proposal, NSP reserved the right, if it deemed the process unsuccessful, to again reject all bids, terminate the current bidding process, and revise the Biomass Phase II RFP to acquire the entire 125 MW of biomass required by the mandate.

## **B. The Parties' Comments on NSP's Plan to Procure 50 MW of Biomass**

### **1. The Department**

The Department supported NSP's proposal as being fair to all short-listed bidders, maintaining the integrity of the bidding process, and permitting NSP to meet the biomass mandate in a timely manner.

The Department expressed concern over NSP's intent to meet individually with bidders to discuss potential problems with individual bids. According to the Department, these meetings could compromise the fairness of the bidding process. It recommended, instead, that NSP should hold only a general clarification meeting to discuss the following:

- the Company's objective to reduce the cost of biomass generation to \$0.06/kWh or less
- the fuel supply and cost implications of the biomass mandate changes
- the status of U.S. Department of Energy Biomass for Rural Development funding

## **2. RUD-OAG**

The RUD-OAG endorsed NSP's stated goals of preserving the integrity of the bidding process, minimizing cost and risk to ratepayers, and treating participating bidders fairly. It argued that NSP's legal requirement to select the most economically reasonable alternative is not waived due to the biomass mandate.

The RUD-OAG further agreed that the time involved in a re-bid could jeopardize significant cost-sharing opportunities. It agreed that NSP could use a rebid as a "backstop" in the event that it is unable to select a prudent project based on the current short list, but asserted that NSP should clearly identify what would trigger a re-bid.

The RUD-OAG expressed concern that the original RFP criteria are now redundant or misleading. The RUD-OAG suggested that instead of putting the proposals through the scoring criteria again, it may be more efficient for NSP to move directly to simultaneous negotiation of contract terms and provisions with all viable projects, using the relevant threshold requirements reflected in the RFP and the draft contract as broad parameters for project and performance requirements.

The RUD-OAG recommended that, to the extent that the change in criteria may elicit new projects, any projects that meet the relevant original threshold requirements and short list criteria should be permitted to engage in a negotiation process.

The RUD-OAG concluded that the RFP criteria were designed in response to a mandate that has now been materially altered. It suggested that the integrity of the bidding process is best preserved by stepping back from that process and commencing with simultaneous negotiations. It noted, however, that the competitive bid process has worked extremely well where technologies and bidders already exist and where those bidders have sufficient certainty regarding the project and the utility's requirements. Accordingly, the RUD-OAG stressed that the Commission should clarify in its Order that any departure from the established competitive bidding process in this instance should not be considered precedential to competitive bidding in the future.

## **3. Norstar Power**

Norstar argued that NSP's plan recognizes the difficulties associated with rejecting the current bids (the loss of federal tax credits or DOE grant money, the lack of fairness to short-listed bidders, and the potential harm to the integrity of the competitive bidding process) but did not provide a satisfactory response. Norstar asserted that the "revised offer process" would fundamentally change the rules of the competition, permitting NSP to take advantage of all of the work done by existing bidders and drive their prices down further under a new competition.

Norstar argued that if the Commission decides to allow NSP to modify the original objectives of the bid by inserting a target price for biomass generation, it should also preserve the fairness and integrity of the process by requiring NSP to reimburse short-listed bidders for costs incurred in their good-faith response to the original RFP.

#### **4. Minnesota Valley Alfalfa Producers**

MnVAP objected to NSP's compliance plan and requested that the Commission issue an Order denying NSP's request 1) to reject all bids and 2) to implement the revised offer process, directing NSP to select the winning bidder and begin contract negotiations.

MnVAP argued that the Kenetech proposal is disqualified from further consideration because of its failure to post the security deposit required of short-listed bidders. It further stated its understanding that Norstar has withdrawn its French Island proposal, and its belief that Norstar's St. Peter proposal is disqualified because its fuel source will not conform to the amendments to the biomass mandate.

MnVAP urged the Commission to reject NSP's revised offer process and require it to award the winning bid. It believes that NSP can negotiate price reductions in the course of contract negotiations which Commission staff could monitor to ensure their reasonableness.

According to MnVAP, revising the process to allow previously disqualified or new bidders is not fair to remaining bidders. MnVAP argued that because bidders trusted that the RFP process would result in an award, bidders have divulged key aspects of their proposals in order to advance project development. It argued that because competitors have gained vital competitive information during the course of this bid process, it would be unfair to permit bidders to submit revised or new offers.

Despite NSP's objectives, MnVAP expressed concern that the revised offer process would still delay the award and cause a project to lose DOE grant funds. This would ultimately make the biomass more expensive than it is currently. The delay could also jeopardize NSP meeting the deadline for the biomass mandate. MnVAP argued that the best way to assure meeting the deadline would be for NSP to immediately begin contract negotiations with the winning bidder.

#### **C. Commission Action Regarding NSP's Plan to Procure 50 MW of Biomass**

Minn. Stat. § 216B.2424 (1994) requires NSP to have 50 MW of biomass under contract by December 31, 1998 and operational by December 31, 2001. The second increment of biomass, 75 MW, must also be under contract by December 31, 1998 and must be operational by

December 31, 2002.<sup>3</sup>

## **1. Mode of Proceeding**

The Commission agrees with the Company that, given the time constraints presented by the legislation and the potential lost opportunities with respect to federal funds, a re-bid of this project would take too much time. In addition, there is no evidence that a re-bid would help NSP overcome other difficulties it associated with the current bid.

However, the Commission views NSP's revised offer process as too closely related to the current bid and represents an unsatisfactory cross between the structure of the approved bidding process and a more loosely-styled negotiation process. This difficulty is picked up by both the RUD-OAG and the Department, who recommend opposite remedies. The Department recommended that the process have more structure and control (e.g., strict communication limits between NSP and the parties), whereas the RUD-OAG suggested that direct simultaneous negotiation is likely to achieve a more desirable result.

NSP proposed to score revised offers using the same scoring criteria as in the phase I RFP. These are the same criteria that, in NSP's judgement, failed to elicit a reasonable project in the phase I bid. The Commission is concerned about the prospect of NSP reusing these criteria and realizing a similar result in this process.

Regarding the Department's recommendation, the Commission is concerned that the Department recommendation to conduct the revised offer process similar to a very structured "best and absolutely final offer" process would fail to give the Company and the bidders the flexibility which this bid has shown us is required to deal with this nascent generation technology. One of the lessons learned from the current bid is that the procurement of biomass generation may not fit neatly into the parameters which the Company and other parties may apply to more conventional generation technology. To result in a reasonable project, NSP and project developers may need to have more leeway to compromise in order to achieve the most reasonable result for ratepayers.

The Commission believes that the simultaneous negotiation process proposed by the RUD-OAG is preferable to NSP's proposal or the Department's modified proposal because it is more separate from the original bid, provides more flexibility to reach agreement on a

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<sup>3</sup> An on-going question before the Commission in matters such as this, where a utility is under a statutory obligation to do something by a certain date, is what level of involvement is appropriate for the Commission in connection with facilitating the meeting of that obligation. In this case, as indicated earlier, the Commission has an on-going interest in preserving the integrity of the competitive bid process as a significant way to promote lower rates and in taking other steps that will promote sound decisions that will benefit the rate payers. After that, however, the Commission simply notes that it is NSP's obligation, not the Commission's, to meet the statutory timetable with respect to the biomass mandate.

reasonable project, and can be carried out in a shorter time frame. At the same time, the RUD-OAG's proposal will meet the objectives set out by NSP: to preserve the integrity of the bid process, to minimize costs and risks to ratepayers, to be fair to existing bidders, and to make a quick selection in order to permit bidders to take advantage of available federal programs and to begin establishing fuel supplies.

Accordingly, the Commission will approve the RUD-OAG's proposal for NSP to move directly to simultaneous negotiations with developers. The Commission ordered this technique previously, in resolution of a complaint filed by LS Power in Docker E-002/C-92-899, with favorable results.

## **2. Finality of the Bid Process**

NSP proposed to use the phase II biomass bid as a backstop to this process in the event that this process does not result in an acceptable project. However, NSP has not provided any criteria which would be used to determine whether this process has failed. Moreover, the availability of a backstop gives NSP less incentive to negotiate in good faith with current developers. To preserve confidence in the integrity of the bid process, the Commission will not approve NSP's proposal to use the phase II bid as a backstop at this time. Instead, the Company will be directed to select a developer for the 50 MW from among the companies that have submitted a bid in this process.

## **3. Timing**

It is clear that time is a critical factor in this process. Failure to act in an expedient fashion could cause developers to lose incentives which will lower the cost of their projects to ratepayers. In the LS Power case, the Commission set a 45 day deadline for negotiations. In this case, an NSP affiliate will be participating in negotiations. To assure fairness, then, the Commission will require that NSP pass the results of its negotiation through the independent evaluator prior to filing a recommendation with the Commission identifying the developer for the 50 MW biomass mandate by July 15, 1996. This deadline is reasonable in light of the advanced stage of the bid process and the fact that the Company had actual notice of the deadline as of the May 16, 1996 hearing on this matter.

#### **4. Clarification**

Departure from the established competitive bidding process in this instance should not be considered precedential to competitive bidding in the future. The process has worked extremely well where technologies and bidders already exist and where those bidders have sufficient certainty regarding the project and the utility's requirements. Any deviations from the approved bidding process in this docket will not become a part of all future RFPs.

#### **ORDER**

1. NSP's proposal to reject all bids is approved.
2. NSP shall conduct simultaneous negotiations, open to all companies who have participated in a bid that has been submitted in this process. On or before July 15, 1996, the Company shall select and submit the name of a developer from among the companies who have submitted a bid.
3. This Order shall become effective immediately.

BY ORDER OF THE COMMISSION

Burl W. Haar  
Executive Secretary

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